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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

No. CR-13-00662-RS

Plaintiff.

STIPULATION

V.

CLIFFORD DALE BERCOVICH and
HOWARD WEBBER,

Defendants.

The United States and the defendant, Clifford Dale Bercovich, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to defendant's counsel of record in this matter Memorandums of Interview Bates Nos. US15353 through US15406.

2. Defendant will not discuss the Memorandums of Interview, or the contents thereof, with any other individual except his counsel of record and defense team. Defendant's counsel of record may discuss the contents of the Memorandums of Interview for the purpose of preparing and evaluating the defense in this proceeding.

3. The documents described above shall not be copied at all unless copying is

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1 necessary for preparation of the defense in this proceeding. No copy of the materials stated herein shall
2 be in the possession of the defendant outside the presence of his counsel of record.

3 4. Any copy of the materials stated herein shall be accompanied by a copy of this
4 Stipulation and Order. No document or copy thereof shall be left with any defense witness.

5 5. Defendant's pretrial release conditions shall be amended to include defendant's
6 compliance with this protective order, and appropriate sanctions may be imposed for any violation of
7 this condition.

8 DATED: 11/15/13


CYNTHIA STIER
Assistant United States Attorney

10 DATED: 11/15/13


ED SWANSON
Counsel for Clifford Bercovitch

12 DATED:

13 11/15/13


CLIFFORD BERCOVICH

15 ORDER

16 In light of the stipulation and agreement of the parties to this action, and good cause appearing
17 therefor, it is HEREBY ORDERED that disclosure of the above-described information shall be
18 restricted as set forth in Paragraphs 1 through 5 above.

21 DATED: 11/15/13


RICHARD SEEBORG
United States District Judge

28 STIPULATION